

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

THABICO COMPANY §
Plaintiff §
§
v. § Civil Action No. 2:16-CV-00427
§
KIEWIT OFFSHORE SERVICES, LTD, §
CMF LEASING CO., and B.R. CRANE §
& EQUIPMENT LLC, §
Defendants §

**MOTION FOR LEAVE
TO FILE OPPOSITION TO MOTION TO ALLOCATE SANCTIONS**

TO THE HONORABLE UNITED STATES DISTRICT COURT:

1. Michael A. Lee and Eric Fryar, (collectively, “Counsel”) file this Motion for Leave to File Opposition to Thabico’s Motion for Allocation of Sanctions, and respectfully submit the following:
 2. The Court set a deadline for Michael A. Lee and Eric Fryar, Counsel for Thabico in this matter, to submit their Response to Thabico’s Motion to Allocate, Doc # 52. Counsel requests leave to file its motion approximately 6 hours late.
 3. The reason for this delay is that Mr. Lee calendared the response due this Friday, November 10, 2017, instead of Thursday November 9, 2017. I sincerely apologize for any inconvenience this may have caused the Court or clerk’s office.
 4. Given the early hour I have not been able to determine whether Thabico and its new counsel object to this request for leave to file 6 hours late. I will therefore submit this Motion as opposed and correct that status as necessary later today when I hear from my colleague representing Thabico. This Motion is not submitted to cause delay, but to ensure that justice may be done.

5. \

Respectfully Submitted,

/s/ MICHAEL A. LEE
LAW OFFICE OF MICHAEL A. LEE
SDTX NO. 14171
State Bar No. 12074620
2026 LATEXO DRIVE
HOUSTON, TEXAS 77018
TELEPHONE: (713) 489-4309
EMAIL: COMLAW@ME.COM

Lead Counsel for Plaintiff Thabico Company

Additional Counsel for Thabico Company

Eric Fryar
Fryar Law Firm, P.C.
SDTX 11783
State Bar No. 07495770,
912 Prairie Street, Suite 100
Houston Texas, 77002-3145
Telephone: 281-715-6396
Email: efryar@fryarlawfirm.com

CERTIFICATE OF SERVICE

I hereby certify that on Friday, November 10, 2017 a true correct copy of Thabico's Motion for Leave was forwarded to all Counsel of Record via the ECF electronic service system.
